

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

PURDUE PHARMA, L.P., *et al.*,

Debtors.

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) Case Nos. 7:21-cv-07532-CM,

) -07585-CM, -07961-CM,

) -07962-CM, -07966-CM,

) -07969-CM, -08034-CM,

) -08042-CM, -08049-CM,

) -08055-CM, -08139-CM,

) -08258-CM, -08271-CM

)  
)  
) On appeal from Bankr. Case  
) No. 19-23649 (RDD)

**MOTION OF THE AD HOC GROUP OF INDIVIDUAL VICTIMS OF PURDUE  
PHARMA L.P., *ET AL.*, SEEKING LEAVE TO INTERVENE PURSUANT TO RULE  
8013(g) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

The Ad Hoc Group of Individual Victims of Purdue Pharma L.P., *et al.* (the “Ad Hoc Group”), respectfully submits this motion (the “Motion”) for an order granting leave to intervene as an appellee pursuant to Rule 8013(g) of the Federal Rules of Bankruptcy Procedure in the above-captioned appeals, certain of which appeal, in relevant part, the following orders: (i) *Findings of Fact, Conclusions of Law, and Order Confirming the Twelfth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors* [Docket No. 3787]; and (ii) *Order (I Authorizing the Debtors to Fund Establishment of the Creditor Trusts, the Master Disbursement Trust and Topco, (II) Directing Prime Clerk LLC to Release Certain Protected Information, and (III) Granting Other Related Relief* [Docket No. 3773], entered by the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) in the jointly-administered case number 19-23649 (RDD) (Bankr. S.D.N.Y.).

In support of the Motion, the Ad Hoc Group respectfully submits: (i) the related memorandum of law with exhibits; and (ii) the attached proposed order.

Dated: October 12, 2021  
New York, New York

WHITE & CASE LLP

By:

/s/ J. Christopher Shore

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Individual Victims of Purdue Pharma  
L.P., et al.*

**CERTIFICATE OF COMPLIANCE**

I certify that the foregoing motion complies with the Federal Rules of Bankruptcy Procedure 8015 and 8013, the Federal Rule of Appellate Practice 27, Local Rule of United States District Courts for the Southern and Eastern Districts of New York 7.1(c), and Judge McMahon's Individual Rules and Practices. The document is in 12-point Times New Roman font and is double-spaced with margins of one inch all around. The document does not exceed the twenty-five page limit specified in Judge McMahon's Individual Rules and Practices and contains 240 number of words.

By: /s/ J. Christopher Shore  
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**CERTIFICATE OF SERVICE**

I certify that on October 12, 2021, I caused to be served the foregoing *Motion of Ad Hoc Group of Individual Victims of Purdue Pharma L.P., et al., Seeking Leave to Intervene* via the CM/ECF Electronic Filing System.

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